

1 EDDY HSU, ESQ. (BAR # 245390)
2 LAW OFFICE OF EDDY HSU
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6 Attorney for Debtor(s)

7 UNITED STATES BANKRUPTCY COURT
8
9 NORTHERN DISTRICT OF CALIFORNIA

10 In Re:

Case No. 18-52601 MEH

11 **Michael Haroutun Miroyan,**
12 Debtor.

Chapter 13

DECLARATION PURSUANT RULE 9006-
1(c)(4)

13 I, **EDDY HSU**, file this declaration pursuant to Local Rule 9006-1(c)(4) in support of
14 Debtor's Motion to Shorten Time.

- 15 1. I, as Debtor's Counsel, needs an Order to Shorten Time to shorten the Notice of Hearing
16 from 28 days to 2 days on my Motion to Withdraw as Counsel and to set the hearing for
17 January 10, 2019 at 9:30AM.
- 18 2. I am unable to set the Motion to Withdraw hearing before Creditor's Motion for Relief
19 from Stay with such an Order Shortening Time.
- 20 3. If I am unable to withdraw, the Debtor may not receive satisfactory representation in the
21 Motion for Relief from Stay. If I am allowed to withdraw, then Debtor may ask for a
22 continuance or present his own response to the Motion for Relief from Stay.
- 23 4. Regardless of the Order Shortening Time, I can no longer represent Debtor to his
24 satisfaction due to irreconcilable differences.
- 25 5. Debtor has not filed for prior extensions nor has he filed for prior bankruptcies.
6. In my opinion, a Court order shortening time will not negatively affect Creditors because
Debtor should have his chance for satisfactory representation.
7. Communications with opposing counsel:
 - a. I spoke directly with Wayne Silver, esq., who represents Kai Family Trust and
filed the Request for Special Notice. Mr. Silver stated he would not oppose an ex
parte to shorten time.
 - b. I sent the following Creditors email regarding my request for an ex parte
shortening time. As non-affected parties, I do not expect any opposition.

- 1 i. Synchrony Bank c/o PRA Receivables Management, LLC
(claims@recovercorp.com)
- 2 ii. Resurgent Capital Services (POC #1-4) – askbk@resurgent.com
- 3 iii. Ocwen Loan Servicing LLC (POC #6) BKTrusteeQueries@ocwen.com
- 4 c. I left a message with the Franchise Tax Board (POC #5) at 916-845-4750
5 regarding my request for an ex parte shortening time. As a non-affected party, I
6 do not expect any opposition.
- 7 d. I called the Chapter 13 Trustee regarding my request for an ex parte shortening
8 time. I left a message with Nannette Dumas, esq. As a non-affected party, I do
9 not expect any opposition.
- 10 8. I spoke directly with the Debtor and emailed him with notice of my ex parte request to
11 shorten time and set the hearing for January 10, 2019 at 9:30 A.M. Based on
12 communications with Debtor, he did not agree to any of my requests.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is both true and correct. Executed this 7th day of January 7, 2019 in San Mateo,
15 California.

16 /s/ Eddy Hsu
17 **EDDY HSU**
18 Attorney for Debtor
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